

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

In re: Valsartan, Losartan and  
Irbesartan Products Liability Litigation

) Case No. 1:19-md-02875

***THIS DOCUMENT RELATES TO:***

) Honorable Robert B. Kugler

GLENN RODDEY, HELEN  
JOHNSON, ALICIA DEGRASIA and  
WILLIAM KOLACEK, on behalf of  
themselves and all others similarly  
situated,,

) Case No. 1:19-cv-12763

Plaintiffs,

) **NOTICE OF RENEWED  
MOTION TO DISMISS FOR  
LACK OF PERSONAL  
JURISDICTION**

v.

CAMBER PHARMACEUTICALS  
INC., HETERO USA INC., and  
LEGACY PHARMACEUTICAL  
PACKAGING, LLC,

) Motion Day: February 3, 2020

Defendants.

) ORAL ARGUMENT REQUESTED

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**TO THE CLERK OF THE COURT AND ALL PARTIES OF RECORD:**

PLEASE TAKE NOTICE that Defendant Legacy Pharmaceutical  
Packaging, LLC (“Legacy”) will move before the Honorable Robert B. Kugler,  
United States District Judge, on February 3, 2020, for an Order dismissing all  
claims against Legacy in this action for lack of personal jurisdiction.

Legacy makes its motion under Rule 12(b)(2) of the Federal Rules of Civil  
Procedure. In support of its motion, Legacy will rely on its separately filed Brief  
in Support of its Motion to Dismiss for lack of personal jurisdiction. *See* Local  
Civ. Rule 7.1(d)(1). A proposed order granting the motion is attached.

Dated: New York, New York  
January 3, 2020

Respectfully submitted,  
  
POLSINELLI PC

By: /s/Frank T. Spano

FRANK T. SPANO (*pro hac vice*)

JASON A. NAGI

fspano@polsinelli.com

jnagi@polsinelli.com

600 3rd Avenue, 42nd Floor

New York, NY 10016

Tel. 212.684.0199

Fax 212.684.0197

BRITTON L. ST. ONGE (*pro hac vice*)

bstonge@polsinelli.com

100 S. Fourth St., Suite 1000

St. Louis, MO 63102

Tel. 314.889.7024

Fax 314.231.1776

*Attorneys for Defendant Legacy  
Pharmaceutical Packaging, LLC*